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- and -

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UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

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Chapter 11 In re

Case No. 05-44481 (RDD) DELPHI CORPORATION, et al.,

> Debtors. (Jointly Administered)

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NOTICE OF PRESENTMENT OF JOINT STIPULATION AND AGREED ORDER COMPROMISING AND ALLOWING PROOFS OF CLAIM NUMBERS 444, 9110, 9114, 9115, 9116, 9790, 9954, 12697, AND 15446 (CONTRARIAN FUNDS LLC)

PLEASE TAKE NOTICE that on January 12, 2007, Delphi Corporation and certain of its subsidiaries and affiliates, debtors and debtors-in-possession in the above-captioned cases (collectively, the "Debtors"), objected to proof of claim number 9954 (a "Proof of Claim") filed by Ferro Corporation and subsequently transferred to Contrarian Funds, LLC ("Contrarian," or the "Claimant"), pursuant to the Debtors' Seventh Omnibus Objection (Substantive) Pursuant To 11 U.S.C. Section 502(b) And Fed. R. Bankr. P. 3007 To Certain (A) Insufficiently Documented Claims, (B) Claims Not Reflected On Debtors' Books And Records, And (C) Untimely Claims (Docket No. 6585) (the "Seventh Omnibus Claims Objection").

PLEASE TAKE FURTHER NOTICE that on February 15, 2007 the Debtors objected to proofs of claim numbers 444, filed by General Pallet, LLC, 9110, filed by Contrarian, as assignee of ENA America Inc., 9114 and 9115, both filed by Okmetic, Inc., 9116, filed by Wacker Chemical Corporation, 9790, filed by AG Machining & Industries, Inc., 12697, filed by Omron Dualtec Automotive Electronics, Inc., and 15446, filed by Photocircuits Corp., (each a "Proof of Claim") all of which have been transferred to Contrarian, pursuant to the Debtors' Ninth Omnibus Objection (Substantive) Pursuant To 11 U.S.C. Section 502(b) And Fed. R. Bankr. P. 3007 To Certain (A) Insufficiently Documented Claims, (B) Claims Not Reflected On Debtors' Books And Records, (C) Untimely Claims, And (D) Claims Subject to Modification (Docket No. 6968) (the "Ninth Omnibus Claims Objection").

PLEASE TAKE FURTHER NOTICE that the Debtors and the Claimant have agreed to settle the Seventh and Ninth Omnibus Claims Objections with respect to the Proofs of Claim, and because the claims (the "Claims") asserted in the Proofs of Claim involve ordinary course controversies and pursuant to the Amended And Restated Order Under 11 U.S.C. §§ 363, 502 And 503 And Fed. R. Bankr. P. 9019(b) Authorizing Debtors To Compromise Or Settle

Certain Classes Of Controversy And Allow Claims Without Further Court Approval (Docket No. 8401), the Debtors and the Claimant have (i) entered into a Settlement Agreement dated as of December 4, 2007 (the "Settlement Agreement") and (ii) executed a Joint Stipulation And Agreed Order Compromising And Allowing Proofs Of Claim Numbers 444, 9110, 9114, 9115, 9116, 9790, 9954, 12697, And 15446 (Contrarian Funds LLC) (the "Joint Stipulation").

PLEASE TAKE FURTHER NOTICE that, pursuant to the Settlement Agreement and the Joint Stipulation, the Debtors and the Claimant have agreed to allow the Claims as general unsecured non-priority claims in the amounts described in the following table:

Claim Number	Allowed Amount
444	\$46,469.32
9110	\$112,891.80
9114	\$126,674.00
9115	\$235,679.69
9116	\$290,509.23
9790	\$222,063.43
9954	\$4,600.00
12697	\$51,720.76
15446	\$13,221.00

PLEASE TAKE FURTHER NOTICE that the Debtors will present the Joint Stipulation for consideration at the hearing scheduled for December 11, 2007, at 10:00 a.m. (prevailing Eastern time) in the United States Bankruptcy Court for the Southern District of New York.

Dated: New York, New York December 4, 2007

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP

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